

## **REMARKS**

### **Status of the Claims**

- Claims 1-12 are pending in the Application.
- Claims 1-12 are rejected by Examiner.
- No claims are amended.

### **Claim Rejections Pursuant to 35 U.S.C. §103**

Claims 1-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,505,255 to Akatsu et al. (Akatsu) in view of U.S. Patent No. 5,940,387 to Humpleman (Humpleman) in further view of U.S. Patent Publication No. 2004/0163126 to Phillips et al. (Phillips) and still further view of U.S. Patent No. 7,139,728 to Rigole (Rigole). Applicant respectfully traverses the rejection.

Initially, the teachings of the cited references are discussed below. Then, the teachings are compared to the claims to highlight the differences between the cited art and the pending claims.

Akatsu discusses a method for formatting and routing data between an external network and an internal network. Akatsu at col. 6, lines 41-51 states:

"FIG. 5 depicts a home gateway 504 bridging multiple external service providers to a preferred home entertainment and home office system network, referred hereafter as "home entertainment system network" 500. The home entertainment system network 500 is connected by an IEEE 1394 bus 568, which is preferably configured in a cable environment (described above with reference to FIGS. 2-3). In particular, a series of daisy-chained, IEEE 1394 cables 502 interconnect between ports of various electronics components of the home entertainment system 500 to form the IEEE 1394 bus 568." (Akatsu, col. 6, lines 41-51).

Humpleman discusses a home multimedia network architecture that includes network interface units within the home network that interface with external networks. (See Figure 2, Humpleman). As stated in col. 3, lines 18-23 of Humpleman:

“Communication with the outside world is performed through a number of separate network interface units (NIU's) 32 and may be combined physically in an entrance unit 30, with each network interface unit 32 permitting a connection between a different external network and the home network 10.” (Humpleman, col. 3, lines 18-23).

Phillips discusses methods and apparatus for delivering a computer data stream to a video appliance with a network interface device. Phillips states:

“Methods and apparatus are provided for delivering a data stream having a computer video signal to a video appliance within a customer premises. A transport medium internal to the customer premises is isolated from a transport medium external to the customer premises such that operational changes to one of the internal and external transport media do not affect the other of the internal and external transport media. The data stream is received from the external transport medium. A television signal is also received from the external transport medium. The computer video signal is combined with the television signal, and the combined signal is transmitted to the video appliance over the internal transport medium.” (Phillips, Abstract)

Rigole discusses a system for online selection of service providers and management of service accounts. Figure 1 of Rigole depicts an Interchange Party Computer System (IPCS 2) that interfaces with an external network 5. Consumer's computer systems 3 and service providers 4 are separately connected to the external network (See Rigole, Figure 1). Rigole at col. 5, lines 18-24 states:

“Looking more specifically at IPCS 2, it electronically facilitates communications and transactions between at least two other participating parties, namely consumers and service providers. Computer systems in system STN 1 [Selection and Transaction Network 1] may be networked over LANs, WANs, the Internet or other known network systems 5 using known protocols for such systems, including TCP/IP.” (Rigole, col. 5, lines 18-24).

Rigole defines the STN (Selection and Transaction Network) system in col. 4, lines 9-27 as “a system of networked computers that permits participating parties to exchange information and *engage in online transactions* with each other relating to the

provision of services over a variety of service sectors. The STN [Selection and Transaction Network] generally means a system that permits input, transfer, managing and computing of data and/or information relative to different participating parties relating to one-stop shopping for consumers.” (Rigole, col. 4, lines 9-18).

Rigole defines the function of the IPCS 1 as follows:

“The IPCS is at the heart of the STN [Selection and Transaction Network] and provides a single *website* which, among other things, *allows consumers to compare and shop for services on-line*, create, manage, update, add and/or cancel service accounts across a variety of different service sectors. The STN system may be described in terms of the computer systems controlled by participating parties and supporting parties (e.g., credit checking agencies) which may play an ancillary role in transactions between consumers and service providers.” (Rigole, col. 4, lines 18-27.)

The Rigole IPCS 2 (Interchange Party Computer System) includes search engine capabilities in a search module per Rigole col. 14, lines 11-21:

“The IPCS 2 may include or be associated with a computer system that includes a Services Search Module 2.03(c). One possible module is as follows. The Module allows consumers to search for services that are not represented on the system site. The consumer enters certain descriptors or “keywords” and then initiates a search. The search results are listed in order of relevance. This feature would normally be provided to consumers for free and powered by one of the many available search engines such as AltaVista, Yahoo!, Excite, or by a custom developed search engine.” (Rigole col. 14, lines 11-21).

Thus, Rigole clearly describes the topology of a network system where a central, independent entity described as an Interchange Party Computer System IPCS, located on an external network 5, interacts via a web-page with other independent separately networked entities, such as service providers and consumer computers that also reside on the external network. The external network 5 is the Internet or an Internet-like external network 5. Thus, communications between the IPCS 2 and its customer computers is accomplished using the external network 5. Applicant respectfully submits that Rigole teaches an on-line search engine computer system

(ICPS 2) that finds utility in offering services from on-line service providers to on-line consumers via electronic web-pages. (See also Rigole, col. 17 lines 25-52).

Although Rigole teaches a search engine (Services search Module in the IPCS 2) that is connected to an external (Internet) network 5, Rigole only services requests from consumer computers 3 that already have access to the external network 5 (Internet). (See Rigole, Figure 1).

These teachings are in distinction with the pending claims.

Pending Claim 1 recites, in relevant part:

*“A module for search and integration of data for devices in a home network the home network having a plurality of individual devices which are connected to one another and communicate among one another via one or more protocols defined for the home network, the home network having at least one connecting device which allows communication between the home network and the external network, the module being able to receive requests for data of the external network from at least one device not capable of independently requesting data of the external network...”* (Part of pending Claim 1).

Claim 1 is directed to a search and integration module in a connection device that is part of a home network. The module in the connection device allows other home network devices to search for data from service providers that reside on the external network. Except for the connection device itself, the home network devices do not have the capability to access the external network directly.

These aspects of pending Claim 1 differ greatly from the architecture of Rigole in which every entity of Rigole Figure 1 has external network connection capability to the Internet. In Rigole, the consumer computers 3 access the IPCS 2 search engine directly via the external network (Internet) to gain information concerning service providers. In contrast, the home network devices of Claim 1 do not have direct external network (Internet) access capability. In addition, the home devices of Claim 1

communicate with the connection device using the home network, not the external network.

Whereas the Rigole customer computers 3 directly access the external network 5 (Internet) to communicate with the IPCS 2 search engine, the home network devices of pending Claim 1 do not have direct access to the external network.

Applicant respectfully submits that Rigole teaches an on-line search engine computer system (IPCS 2) that offers services from on-line service providers to on-line consumers via web-pages. Thus, the contribution of all of the actual teachings of Rigole to the combination of the systems of Akatsu, Humpleman, and Phillips is to add a search engine as an entity on the external network. Accordingly, the combination of Akatsu, Humpleman, Philips, and Rigole results in a home network with a connection to an external network, where the external network has a Rigole IPCS 2 search engine. The Rigole IPCS 2 search engine fails to service home network devices that do not have direct external network (Internet) access. The Rigole IPCS 2 only services computers that have direct external network (Internet) connections.

Since Rigole teaches an external network-based (e.g. Internet) search engine, then the contribution of Rigole to the systems of Akatsu, Humpleman, and Phillips is only an external network search engine. Thus, Rigole fails to teach, among other things, a search engine on a home network that is able to receive requests for data of the external network from at least one device not capable of independently requesting data of the external network as recited in pending Claim 1.

Applicant respectfully submits that the combination of Akatsu, Humpleman, Phillips, and Rigole fails to teach or suggest the Claim 1 combined elements of: "A module for search and integration of data for devices in a home network,... *the home network having at least one connecting device* which allows communication between the home network and the external network, the module being able to receive requests for data of the external network from at least one device *not capable of independently requesting data of the external network*... the module being able to search for the requested data from at least one data provider in the external network...." because the

cited combination of references fails to teach a connection device that is part of the home network where the connection device receives search requests for external network data from home network devices that do not have access to the external network.

Since the combination of Akatsu, Humpleman, Philips, and Rigole fails to teach or suggest all aspects of independent Claim 1, then the combination of Akatsu, Humpleman, Philips, and Rigole cannot render obvious pending Claim 1 under 35 USC §103(a) as well as their dependent Claims 2-12 per MPEP §2143.03. Thus, all pending claims patentably define over the cited art.

Applicant respectfully requests reconsideration and withdrawal of the 35 USC §103(a) rejections on Claims 1-12 in light of the arguments presented above.

**Conclusion**

Applicant respectfully submits that the pending claims patentably define over the cited art and respectfully requests reconsideration and withdrawal of all rejections of the pending claims. In addition, since the pending claims patentably define over the cited art, Applicant respectfully requests a Notice of Allowance for all pending claims.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 07-0832 therefore.

Respectfully submitted,  
Ralf Kohler

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/Jerome G. Schaefer/

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Jerome G. Schaefer  
Attorney for Applicant  
Reg. No. 50,800  
(609) 734-6451

Thomson Licensing, LLC  
Patent Operation  
PO Box 5312  
Princeton, NJ 08543-5312